ID 09961
3.18.87
49

EPA REVIEW WORKSHEET OF
STATE HAZARDOUS WASTE INSPECTION REPORT

Facility Arrcom
Address Highway 53
Rathdrum, Idaho
ID # IDD 000800961

RECEIVED
MAY 26 1987
WASTE MANAGEMENT BRANCH

Inspection Date March 18, 1987
Inspector Scott Lund
Date Received April 29, 1987
Report Date April 29, 1987

COMPLIANCE SUMMARY FROM INSPECTION REPORT

Summary of Violations

Numerous violations of 40 CFR 265 requirements

Summary of Enforcement Response

See inspection report. Superfund emergency removal action is underway at the site.

Adequacy of Inspection Documentation (Pictures, Narrative, Checklists)

Narrative report, picture documentation and checklist are all adequate.

Timeliness and Appropriatness of Enforcement Action (see State and EPA Enforcement Response Policies)

EPA has taken no enforcement action against Arrcom and reached agreement with Arrcom in an Agreed Penalty Order dated 20 June 1985. It is my understanding that Arrcom is in violation of the Agreed Order.

Questions about Findings, and Unresolved Issues

Other Comments and Recommendations

It appears that further enforcement actions against Arrcom are warrented.

USEPA RCRA
3009283

Steve Provant
REVIEWER - NAME

Steve Provant
(SIGNATURE)

5-21-87
DATE OF REVIEW

STATE OF IDAHO

DEPARTMENT OF HEALTH
AND WELFARE

DIVISION OF ENVIRONMENT
Statehouse
Boise, Idaho 83720

April 29, 1987

MEMORANDUM

TO: Steve Provant

FROM: Mark Torf SL for

SUBJECT: RCRA Compliance Inspection Report

Attached is a Hazardous Waste Management Act/RCRA Compliance Inspection Report for the Arrcom facility. Based on current Superfund activities, we are not planning to proceed with any RCRA enforcement action at this time.

Please contact me if you have any questions or concerns.

MT/jd

Attachment

RCRA COMPLIANCE INSPECTION NARRATIVE REPORT

Date of Inspection:

March 18, 1987

Facility:

ARRCOM, Inc. (Drexler Enterprises, Inc.)

EPA Identification No.:

IDD000800961

Address:

Highway 53
3 miles west of Rathdrum
Rathdrum, Idaho 83858

Report Prepared By:

Scott Lund
Sr. Hazardous Materials Specialist
Division of Environment (DOE)
Department of Health and Welfare (IDHW)

Inspection Participants:

Steve Provant, EPA/Idaho Operations Office

Background Information:

ARRCOM, Inc. submitted a Part A RCRA Application to EPA on November 17, 1980 for on-site storage, treatment and/or disposal of hazardous waste. The facility initially qualified for interim status under RCRA to store and treat ignitible, corrosive, and spent solvent hazardous wastes. On June 20, 1982, an inspection conducted by EPA at the facility found that hazardous waste and/or hazardous waste constituents had been stored, spilled and/or disposed on-site.

An EPA Complaint and Compliance Order issued on April 27, 1983, required ARRCOM, Inc. to submit a Part B RCRA Permit

Application within 180 days of their receipt of the order. On May 27, 1983, the facility owner submitted a letter to EPA stating that the facility would not be used for the handling of hazardous waste in the future. The letter also clarified the intention of the facility owner not to submit a RCRA Part B Permit Application. In May of 1984, EPA published notice of the intent o terminate interim status at ARRCOM. This action was not finalized. In August of 1985 EPA again took action against ARRCOM, Inc. EPA stated that action to terminate interim status would be taken unless the facility: a) applied for a final determination regarding the issuance of all required permits by November 8, 1985; or b) certified that such facility was in compliance with all applicable groundwater monitoring and financial responsibility requirements. To the best of our knowledge ARRCOM has not complied with either option. As of the date of this report EPA has not taken action to terminate interim status for ARRCOM, Inc.

ARRCOM has been the site of limited Superfund activity and is on the Superfund's National Priorities List. On July 20, 1982, an EPA team visited the site and collected samples of contaminated soil and materials from some of the tanks. The analysis showed soil contamination and some PCBs. The site was declared an immediate threat to the public health and welfare and a Federal Immediate Removal action was taken by EPA. Cleanup operations started September 18, 1983, and were completed on September 21, 1983. All the wastes were not removed from the site. Sludges were left in the bottom of tanks, filled drums with wastes were left in sheds and apparently liquid wastes were left in some underground storage tanks and piping, and soil containing sludge and liquid waste were left in place.

Kootenai County took possession of the ARRCOM, Inc. property for non-payment of taxes on February 11, 1986. The action is recorded in Book 342, Page 71, in the Kootenai County Recorders Office, Coeur d'Alene. Thus, ARRCOM, Inc. is now considered as a locally owned TSD facility.

Inspection:

The ARRCOM site status remains out of compliance with all applicable 40 CFR Part 265 requirements for treatment, storage and disposal (TSD) facilities. No change of compliance status was noted since previous inspections. Access to the site remains unrestricted. The site is not posted with signs warning of apparent hazards.

the vehicle to walk the site we were greeted by two dogs apparently from a residence behind the facility. The animals were protective of the property but unsure of their status at the ARRCOM site.

A disposal area, evidenced by a layer of hardened black sludge, was discovered in the northwest quadrant of the site near a stack of cinder blocks. Needles from the nearby trees have obscured most evidence of the black sludge material. The disposal area covered approximately 150-200 sq. ft. A second disposal area also containing a black sludge material was discovered approximately 50 ft. southwest of the on-site water well. The area of disposal was hard to discern but appeared to be approximately 40 sq. ft.

Several tanks on-site appeared to be insulated with asbestos. Tank T-25 had the insulating material on the recessed bottom end. The boiler located inside the cinder block building also had a degenerating insulation shell. An abandoned treatment tank in the northwest quadrant was partially insulated, however, most of the material had sluffed onto the ground. This tank did not have an inventory identification number and is identified as U-3 in this report.

Two drums of sludge were observed outside the facility buildings. The first drum appeared intact and was located beneath the funnel tank T-22. The second drum was located in a west-facing entrance to the aluminum shop adjacent to the boiler room. This drum was severely corroded and the contents was spilled onto the ground. Soil in this general area was fairly saturated with oil.

Underground piping surfaced beneath the truck loading rack and appeared to contain oil. It is unknown if contents of the underground tank(s) have been removed.

Summary:

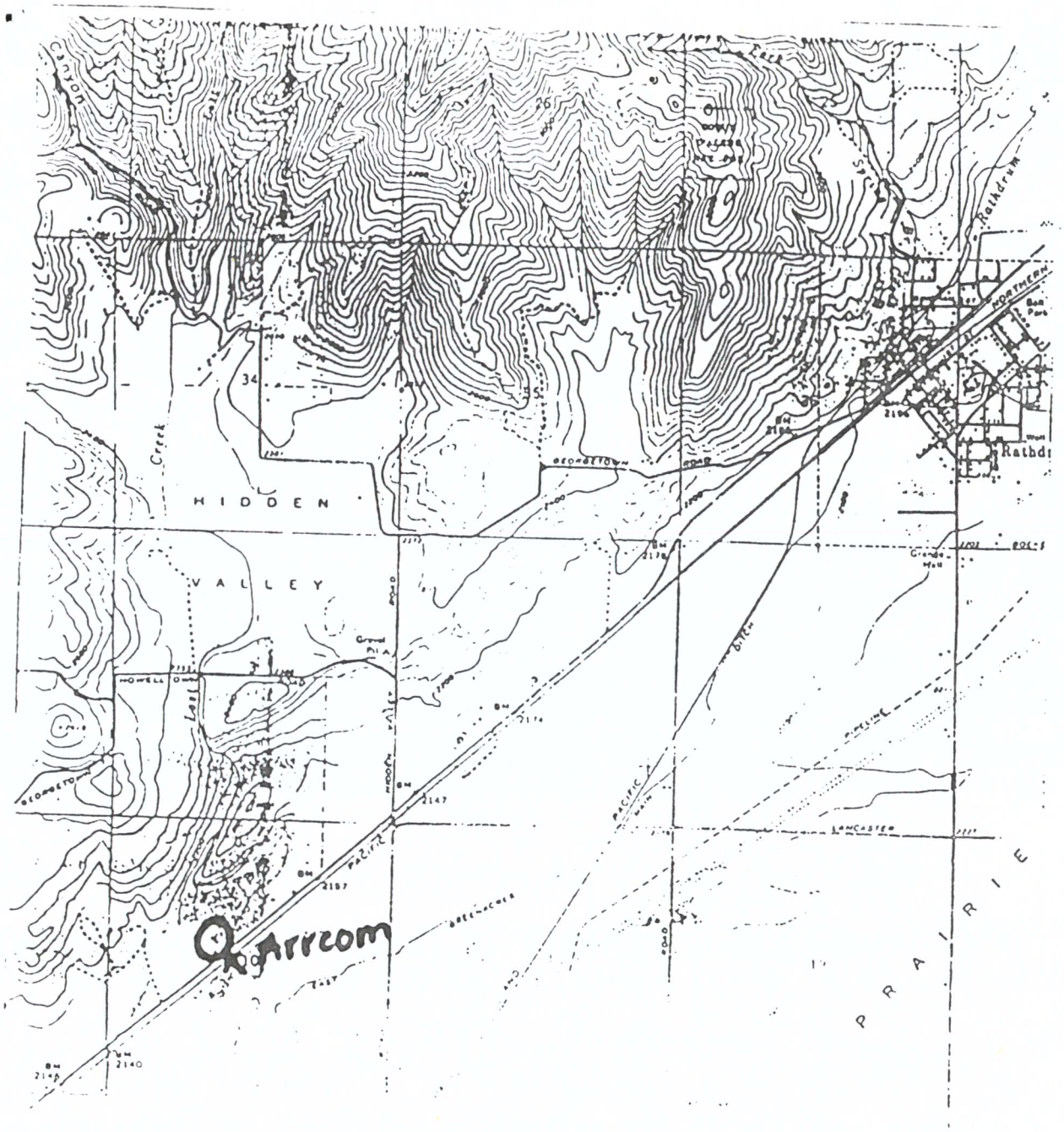
The ARRCOM facility continues to be a potential hazard to public health and the environment. No efforts have been made to restrict access to the site nor is there any posting of potential hazards at the site.

ARRCOM rests above the Rathdrum aquifer, designated as a sole source aquifer supplying water for much Kootenai and Bonner Counties in Idaho and the Spokane area of Washington. The location of an on-site well has been documented. This well needs to be sampled.

Removal and proper disposal of all tanks, solid waste and contaminated soils is recommended to properly close this site. Monitoring wells and bore samples are needed to determine the extent of contaminant migration.

Scott Lund
Sr. Hazardous Materials Specialist
Hazardous Materials Bureau

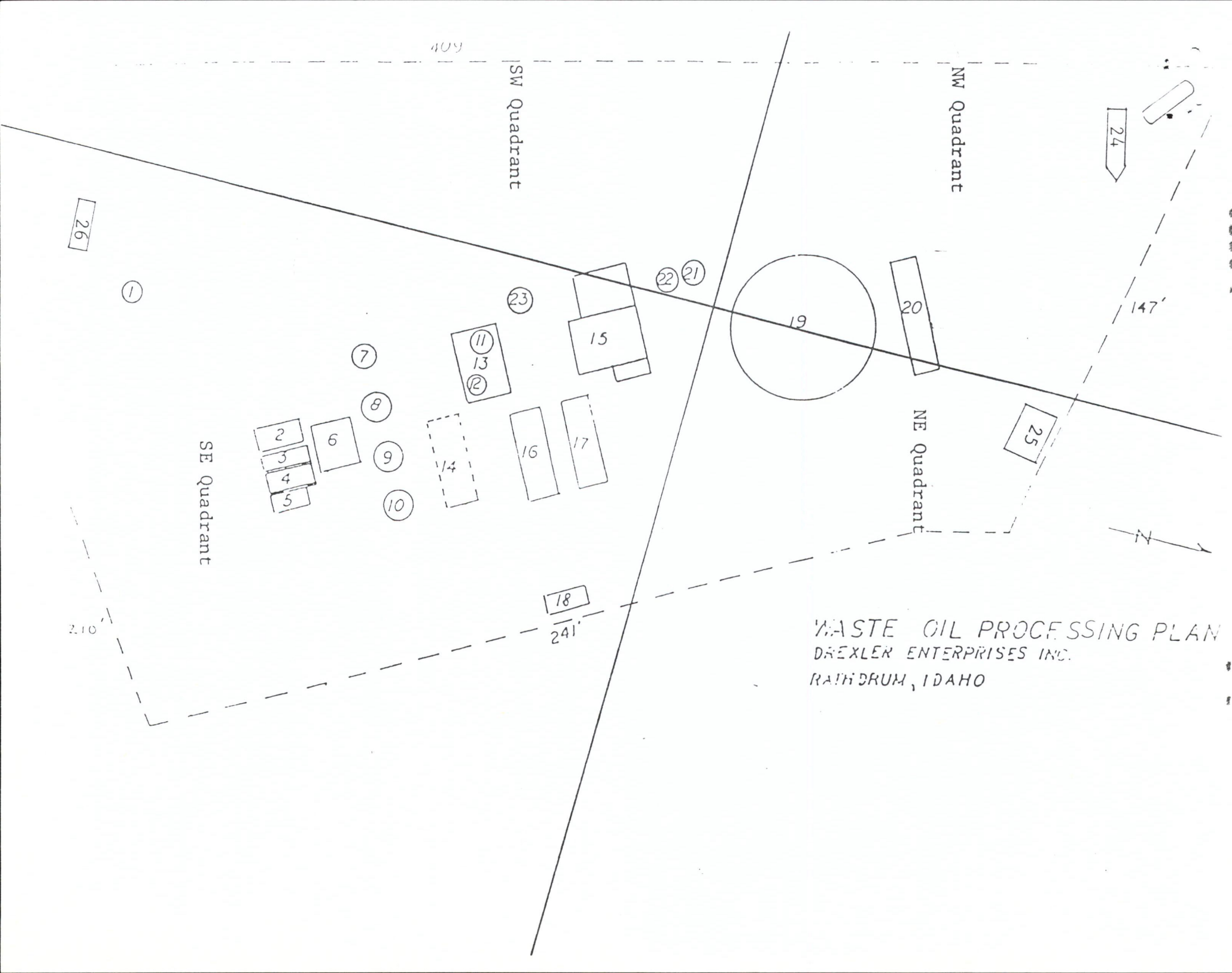
SL/jd



Arrcom, Inc.
Rathdrum, Idaho

IDD000800961

site location map
Rathdrum, Idaho quadrangle
T. 51 N., R. 5 W. section 10


409
SW Quadrant
NW Quadrant
SE Quadrant
NE Quadrant
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14
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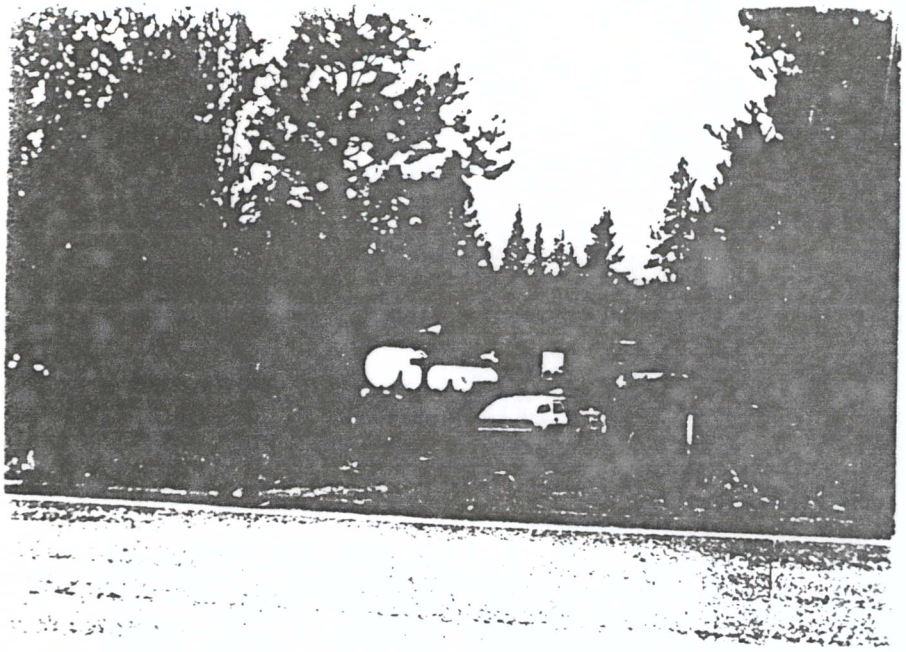
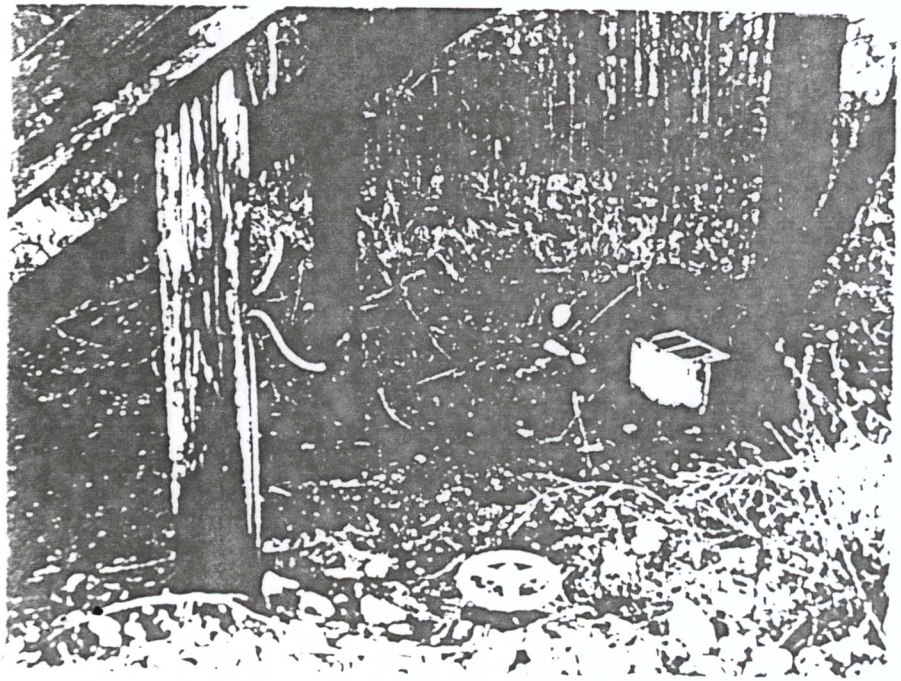
26
147'
241'
210'
N
WASTE OIL PROCESSING PLAN
DREXLER ENTERPRISES INC.
RATHDRUM, IDAHO

1. Water Well
2. T-48 2,000 Gal. Re=refined oil
3. T-23 1,000 Gal. Re-refined oil
4. T-24 1,000 Gal. Re-refined oil
5. T-11 550 Gal. Re-refined oil
6. Electrical storage
7. T-47 2,000 Gal. Water separator
8. T-145 6,000 Gal. Finished oil storage
9. T-120 5,000 Gal. Finished oil storage
10. T-119 5,000 Gal. Finished oil storage
11. T.28 1,200 Gal. Electric heater tank
12. 48" shaker
13. T-144 6,000 Gal. underground finished oil
15. Boiler room with work shop
16. T-142 6,000 Gal. Heater tank with coils
17. T-143 6,000 Gal. Heater tank with coils
18. Truck loading rack
19. T-1071 45,000 Gal. Waste oil storage
20. T-238 10,000 Gal. Waste oil storage
21. U-1 1,200 Gal. Treatment tanks
22. U-2 1,200 Gal. Treatment tanks
23. T-71 3,000 Gal. Fuel storage
24. U-3 1,200 Gal. Treatment tank
25. Disposal area
26. Disposal area



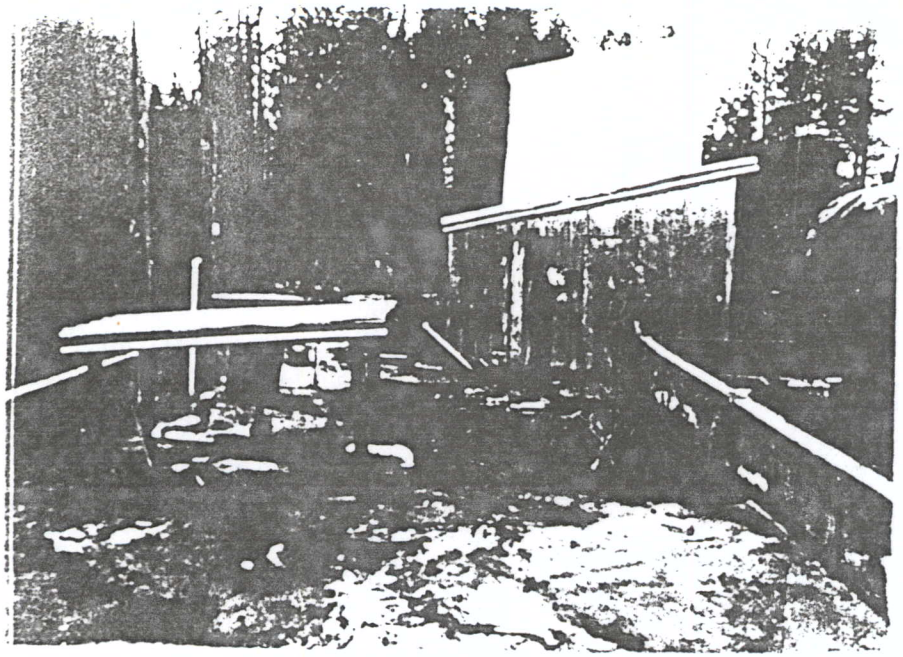
1. Entrance to the ARRCOM, Inc., 3 miles west of Rathdrum Hwy 53.

2. Manhole where on-site source of water was located.

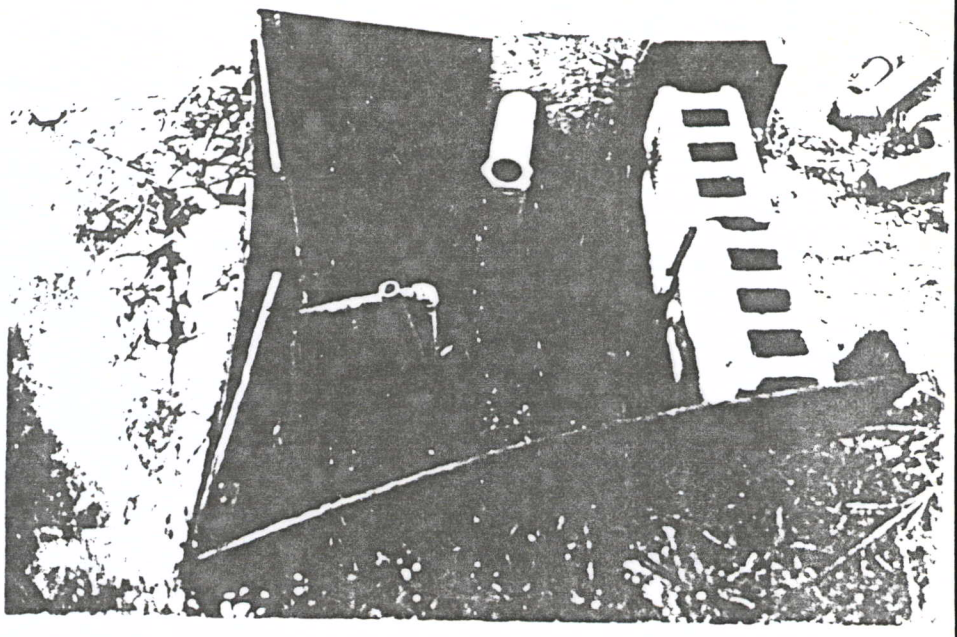


3. Underground piping at loading/ unloading structure. Liquid waste

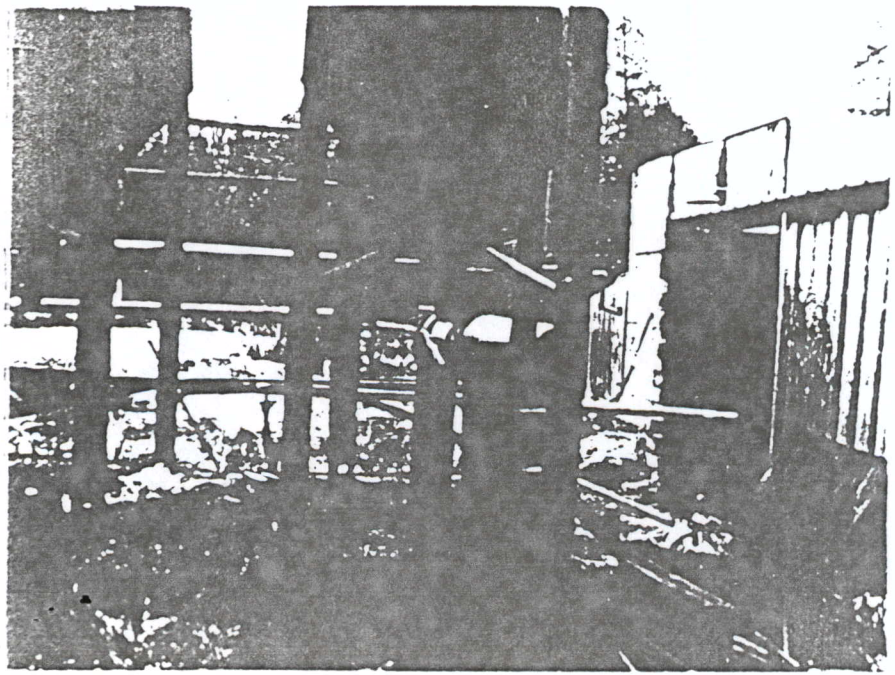
4. Bottom end of tank cover [illegible]



5. Underground tank containing liquid waste.



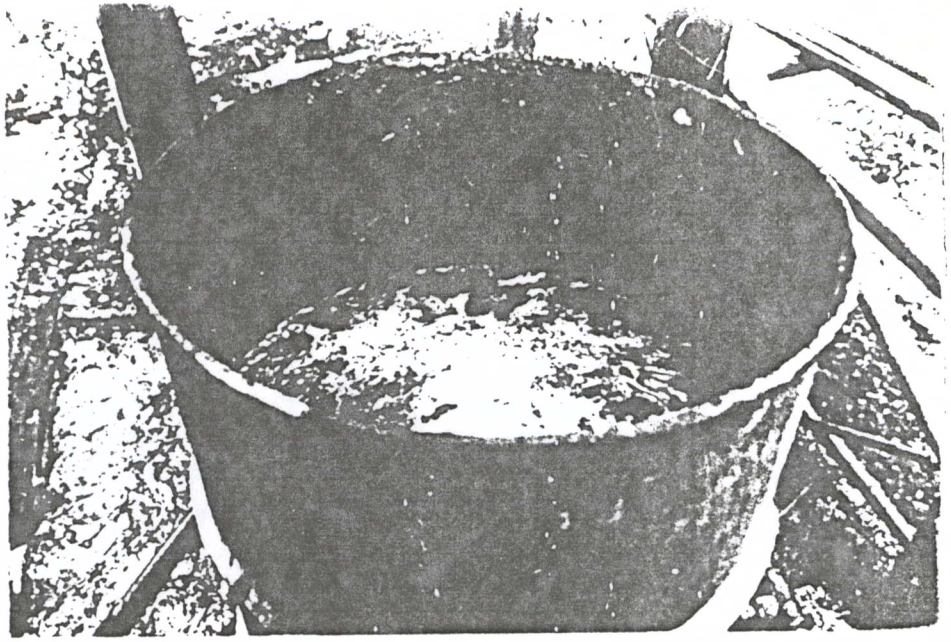
6. Sump and piping leading [illegible] underground tank.



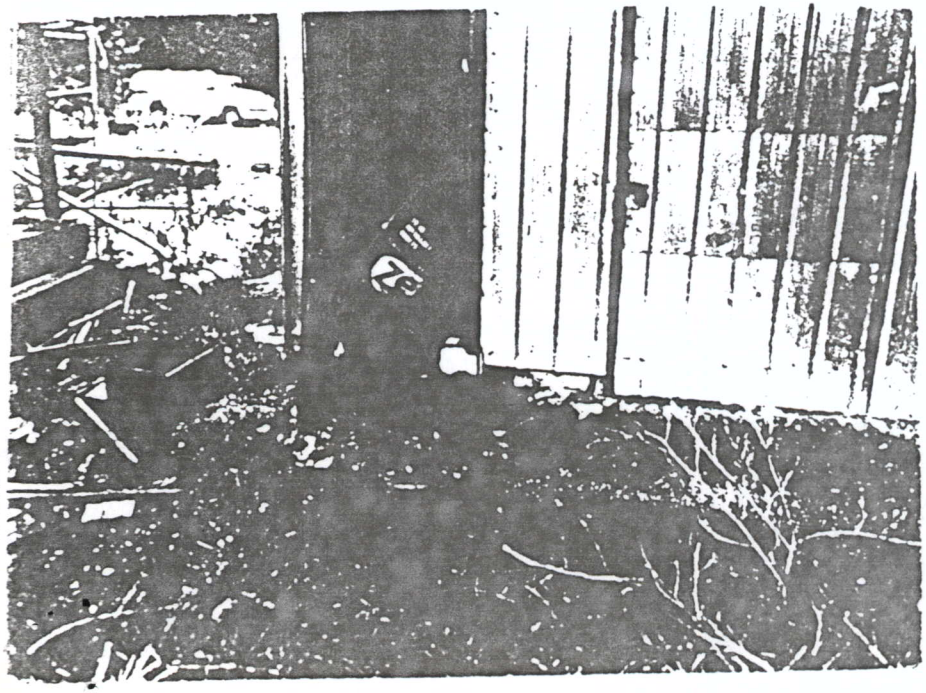
7. [illegible] residues on site structures

8. Area where waste sludge [illegible]

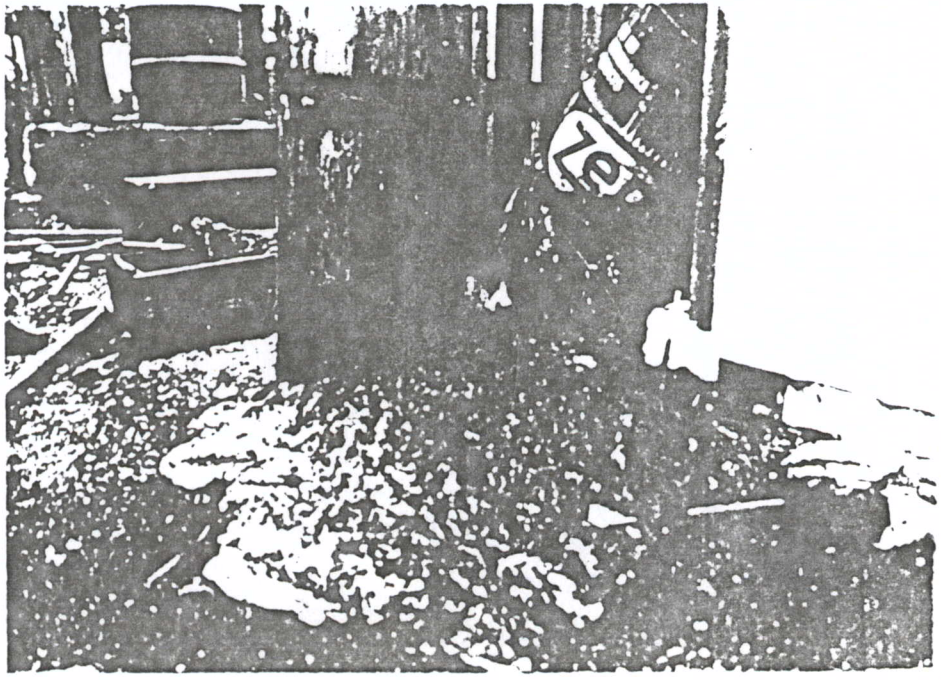
9. Drain hole leading to underground tank.



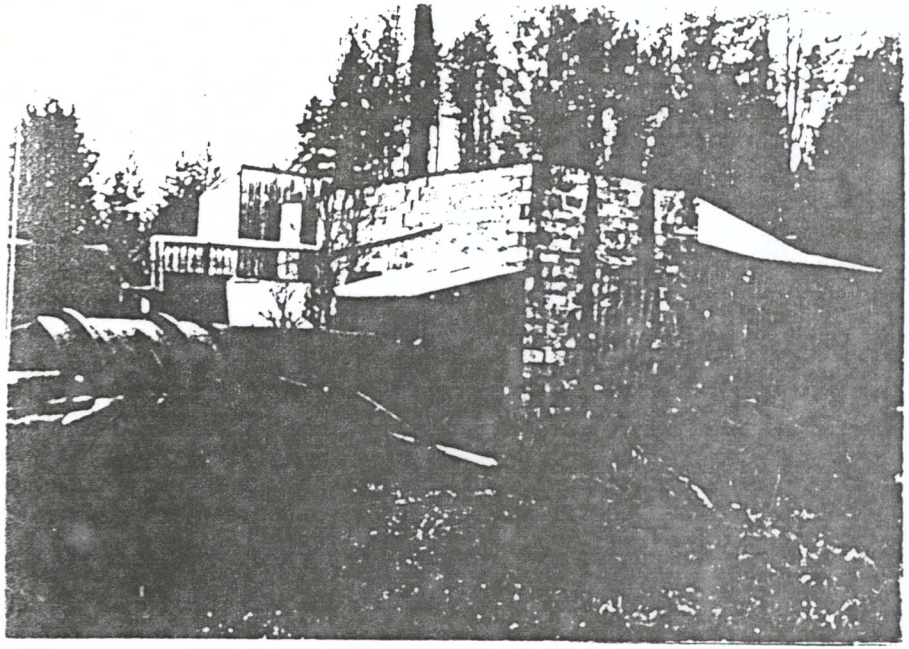
10. Drum standing open containing liquid waste.



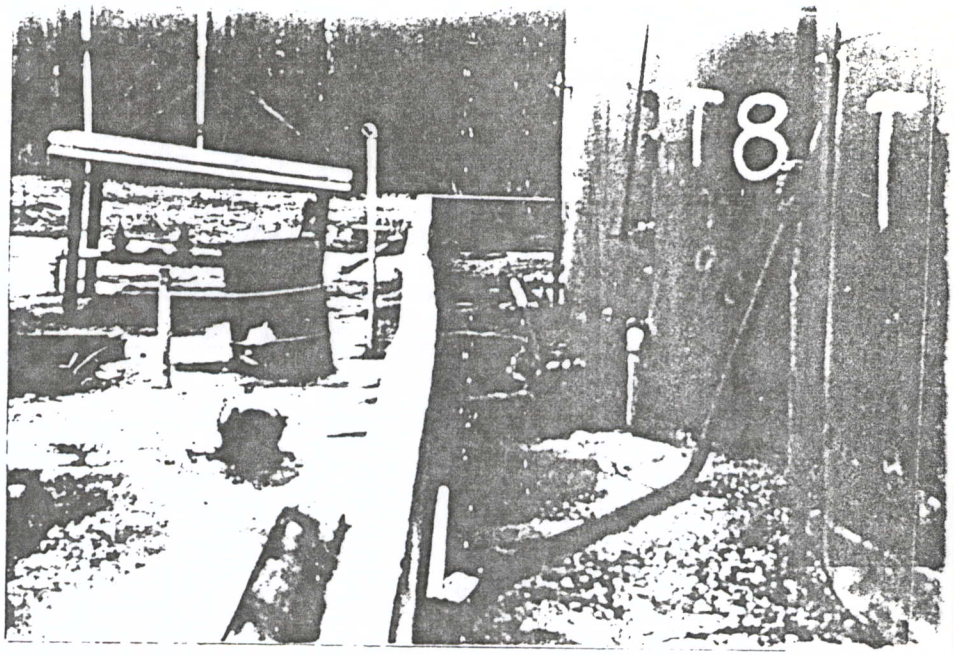
11. Drum in storage shed had corroded through and leaked contents onto



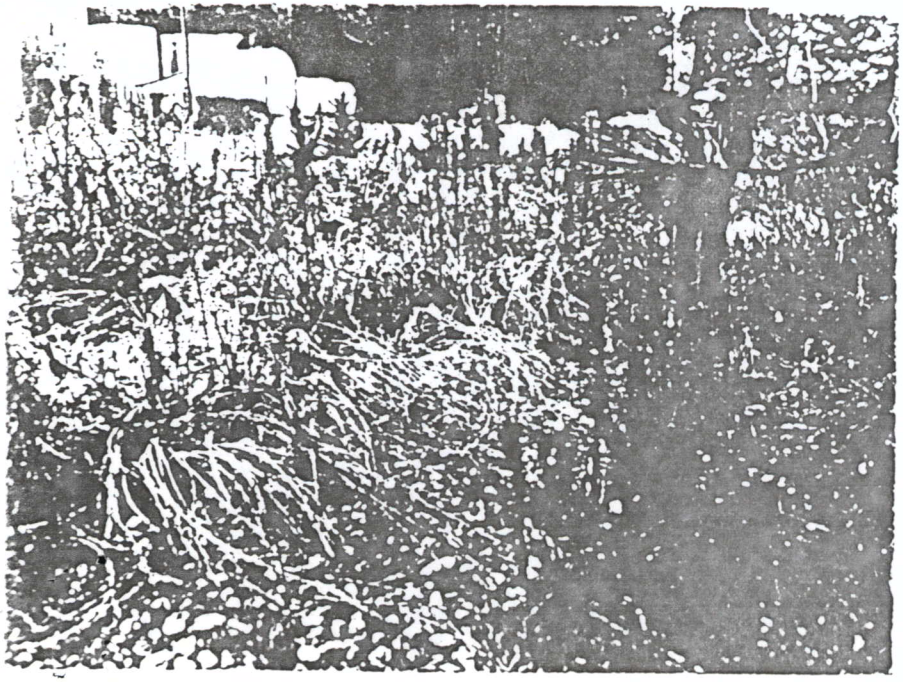
12. Same as picture 11



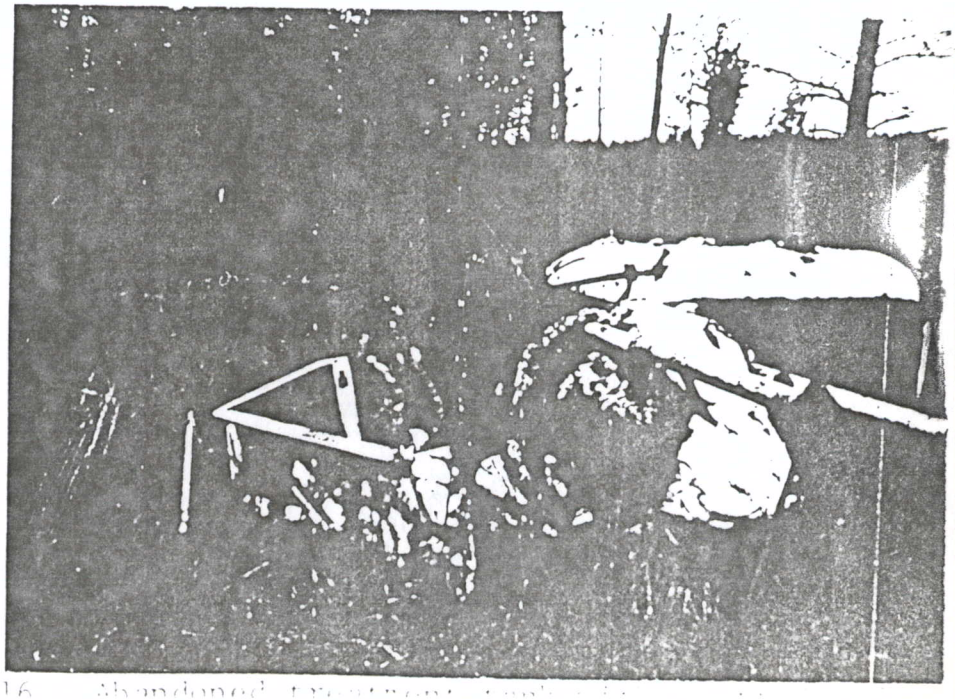
13. Cinder block building containing boiler apparently covered with asbestos and soil containing waste residues.



14. Bermed tank storage a... underground piping. ... berm leads to underg...



...sposal area located ... 50' from well.



16. Abandoned treatment ...

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Region 10 Inspection Checklist

Purpose--This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to RCRA for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

I. General Information
II. Small Quantity Generator (SQG) Regulations (40 CFR 261.5)
III. Generator Regulations (40 CFR 262)
IV. Transporter Regulations (40 CFR 263)
V. Treatment, Storage, and Disposal (TSD) Interim Status Regulations (40 CFR 265)
VI. Treatment, Storage, and Disposal (TSD) Permit Status Regulations (40 CFR 264)

I. General Information (Date Revised March 8, 1983)

A. Inspection: Type of Inspection: Evaluation (✓); Sampling ( ); Record Review (✓); Special ( ); Follow-up;
Date/Time Inspection commenced: 3-18-87 1055 hours

B. Facility
EPA/State ID IDD-000800961
Name & Addresses ARRCOM INC.
1. Mailing: Kootenai County Coeur d'Alene, ID
2. Location: 3 miles west of Rathdrum
Hwy 53
Rathdrum, ID 83858
Contact:
Telephone: (208) 664-8291

C. Compliance Summary

	IN	OUT	N/A
RCRA (Statute)	( )	( )	( )
40 CFR 270	( )	(✓)	( )
40 CFR 124	( )	( )	( )
40 CFR 261.5	( )	( )	( )
40 CFR 262	( )	( )	( )
40 CFR 263	( )	( )	( )
40 CFR 264 (Permit)	( )	( )	( )
40 CFR 265	( )	(✓)	( )

Specific Violations: Site is abandoned. Site has in past accepted hazardous waste. Waste has been spilled or disposed on site. There is no access control or management of the site. There is no waste management or records at the site. In violation of 40CFR 265 requirements pertaining to TSD facilities and 40CFR 270 permitting requirements.

D. Inspector

Name (Print) Steve Provant / Scott Lund — Title: Environmental Prot. Specialist / Sr. Hazardous Materials Spe
Signature Steve Provant / Scott Lund
Organization EPA/IDO / Idaho HW DOE
Phone (208) 334 9047 / (208) 334-5879

E. Inspection Participants:

Name	Title	Phone #

F. Notification/Permit Information

1. Started operation: _____ Date: _____
2. Notification filed: YES NO Date: _____
3. Part A application filed: (YES) NO Date: 11-17-80
4. Part B called/Date Due (YES) NO Date: 4-27-83
5. Part B application: YES NO Date: _____
6. Changes in Notification or Part A: Facility owner notified EPA on 5-27-83 of intention not to submit Part B permit.
7. Facility's classified as:

Generator	(4)
Transporter	( )
Treatment facility	(4)
Storage facility	(4)
Disposal facility	(4)
Small quantity generator	( )
Recycler	(4)
Less than 90 day storage	( )
Wastewater treatment unit exemption (WWTU)	( )
Elementary neutralization unit exemption (ENU)	( )

8. Does facility have a Part A withdrawal request in ?
YES (NO)

Status _____

Comments: Site closed and abandoned in January 1982

G. Hazardous Waste Generation (HW)and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

(1) Ignitability D-001
(2) Corrosivity D-002
(3) Reactivity
(4) EP Toxicity

b. Listed HW?

(1) HW from non-specific sources (FXXX)
F-002, F-005

(2) HW from specific sources (KXXX)

c. Discarded commercial chemical product(PXXX or UXXX)

(1) PXXX
(2) UXXX

d. Has facility petitioned to delist waste? YES (NO)

Date: Comments:

e. Does facility qualify for WWTU or ENU? YES (NO)

Comments:

f. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? UNKNOWN

(1) What are the wastes generated? UNKNOWN

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in Part 261)?

Comments: Site abandoned - NO records are available. EPA has analysis of wastes remaining at the Facility.

(3) Are records available on the determination(s)? YES (NO)

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/ Part A application? UNKNOWN YES NO

If so explain.

2. Specific information
Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW.)

a. EPA HW Code
b. HW description
c. Composition (including sampling requirements)
d. Process producing waste:
e. Rate of waste production
f. Time of storage
g. Waste handling prior to disposal
h. Waste disposal practice and manifest
i. Reporting and recordkeeping
j. Comments

H. Miscellaneous Notes:

Above specific information cannot be addressed. Site is abandoned - no records available.

III. Generator Regulations 40 CFR 262 (Date Revised March 8, 1984)

A. Is the facility or does facility claim to be a small quantity generator? YES (NO)

Comments: _____

B. Does generator transport its own waste? YES NO did apparently when operating.

1. If NO, what is contractor's EPA ID, name, address, and phone?

2. If YES, see Transporter Regulations (Section III).

C. Does generator use the manifest system? YES NO

1. Does the Generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES NO

What transporters or TSD facilities?

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.

3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.

Does the manifest contain the following information:

Unknown records not available

a. Manifest document number YES NO

b. Generator's name, mailing address, phone number, and EPA ID number YES NO

c. Name and ID number of each transporter YES NO

d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any. YES NO

e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203. YES NO

- Proper shipping name YES NO
- Hazard Class YES NO
- Identification number YES NO

f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle. YES NO

4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and EPA regulations? YES NO

5. Does the manifest contain an adequate number of copies to provide one copy for:

a. Generator's records YES NO

b. Records of each transporter YES NO

c. TSD facility owner or operator's records YES NO

d. Signature by each transporter and return to generator YES NO

e. Signature by TSD facility and return to generator YES NO

Unknown. Paperwork must be available

6. Does the generator use the manifest properly by:

a. Signing the certification YES NO

b. Obtaining signature and date of acceptance from initial transporter YES NO

c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility YES NO

d. Giving transporter the remaining copies of the manifest YES NO

7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? YES NO

8. Does the generator submit an Exception Report to the U.S. EPA in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? YES NO

9. The Manifest Exception Report must include

   a. A legible copy of the manifest and

   b. A letter of explanation describing efforts and results of status investigation.

Unknown paperwork not available

********** TSD FACILITIES SKIP TO MODULE V **********

D. Does generator operate a specific area on-site for container handling or storage? YES NO

1. Does generator comply with the requirements set forth in governing on-site waste accumulation: YES NO

   a. Labeling and marking YES NO

   b. Dating YES NO

   c. Inspections (weekly for containers) YES NO

2. Are incompatible wastes segregated? YES NO

3. What quantities of HW are stored? _____

4. What is the longest period that it has been stored? _____

5. Were there any hazardous wastes stored on site at the time of inspection? (90 day storage allowance is allowed only if waste is stored in accordance with §262.34; i.e. must be stored in containers or tanks. Thus need to make note if storing in waste pile, etc.) YES NO

   a. If yes, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? YES NO

   b. If not properly packaged or in secure tanks, please explain. YES NO

   c. Are containers clearly marked and labeled? YES NO

   d. Do any containers appear to be leaking? YES NO

   e. If yes, approximately how many? _____

No wastes are stored on site. No management of waste. No records available.

6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met. YES NO

a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES (NO)

b. Are the containers always closed, except to add or remove waste? YES (NO)

c. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES (NO)

d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES (NO)

e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? (YES) NO

f. Is the facility aware of and complying with the following requirements for incompatible wastes:

(1) Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

(2) HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

(3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

Explain?

Unknown

g. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES (NO)

h. Comments:

7. a. Does the generator import or export HW? YES NO

b. If yes, has notification of this activity been submitted to the EPA Regional Administrator? YES NO

c. Is a copy of that notification available? (If yes, obtain copy). YES NO

d. If a copy is not available, or can not be obtained, determine: 1) when the notification was submitted; 2) for what waste type and; 3) for what foreign facility (name and address). YES NO

Unknown

8. TANKS

Where tanks are used to store hazardous waste, the requirement of 40 CFR Part 265 Subpart J must be complied with (except 265.193), as follows:

a. Is storage in tanks conducted such that:

(1) It does not generated heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO

(2) It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) YES NO

(3) It does not produce uncontrolled flammable fumes or gases? YES NO

(4) It does not damage the tank? YES NO

(5) It does not threaten the environment in other ways (i.e., leaks, spills)? YES (NO)

Comments: Tanks are not maintained Site is abandoned.

Unknown

b. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

If no, is secondary containment used? YES NO

(Explain)

c. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

Facility is not operating. Some tanks are open allowing precipitation to enter the tanks

d. Are inspections of the following conducted:

(1) Discharge control equipment? YES (NO)
How often?

(2) Waste feed cut-off systems? YES (NO)
How often?

(3) Data from tank monitoring equipment? YES (NO)
How often

(4) The level of waste in the tank? YES (NO)
How often?

(5) The structural integrity of tank? YES (NO)
How often?
How are inspections conducted?
What is observed (looked for)?

(6) The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? YES (NO)

e. (1) Have any tanks once used for storage of hazardous waste been closed or their function changed? When? No

(2) Were all hazardous wastes and/or residues removed? YES (NO)

(3) What was the disposition of the wastes or residues (i.e., where did it go)? YES (NO)

(4) When shipped?

f. Are ignitable or reactive wastes placed in tanks? (YES) NO when facility was operating

If yes, what measures are used to prevent ingnition or reaction? None

g. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES NO Unknown

h. (1) If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? (YES) NO

(2) Are "No Smoking" signs posted? YES (NO)

(3) Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES (NO)

Explain

9. Preparedness and Prevention (265 Subpart C)

a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES (NO)

Explain:

b. Is internal emergency communication equipment or alarm systems installed? YES (NO)

What type?

c. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES (NO)

d. Are fire extinguishers or other emergency equipment immediately available on-site YES (NO)

e. Is emergency communications and response equipment tested? YES (NO)

How often?

f. Is aisle space adequate for emergency response? (YES) NO

What is aisle spacing?

g. (1) Have any arrangements been made with local emergency response organizations? YES (NO)

(2) Which organizations?

(3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

Explain:

10. Contingency Plan/Emergency Procedures

a. Has contingency plan been developed? (It may be a modified SPCC plan) YES (NO)

b. Have incidents occurred where the plan has been implemented? YES NO Unknown

c. Have incidents occurred where the plan should have been implemented but was not YES NO Unknown

Explain

d. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

No plans are located at facility

(1) Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? YES NO

(2) Does the plan describe arrangements made with external emergency response organizations? YES NO

(3) Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? YES NO

(a) Is the list current? YES NO

(4) Is all emergency equipment available at the facility listed in the plan? YES NO

(a) Is the location and a description of the equipment included? YES NO

(b) Are capabilities described for each piece or equipment unit? YES NO

(5) Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? YES NO

(6) Is a copy of the plan maintained at the active facility (versus main office)? YES NO

(a) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO

To which?

(7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO

How are they available

What are the limits of this person's authority to respond to emergencies?

(8) Has an emergency occurred? YES NO

Was the plan implemented? YES NO

(Describe the incident)

11. Personnel Training

a. Has a training program been developed? YES NO

What type? (Classroom? On-the-job Training?)

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including:

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off? YES NO

(3) Communications or alarm equipment? YES NO

(4) Response to fire and explosion? YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO

(a) Does the job description include the skill, education or qualifications required for the position? YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee? YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

E. Is Generator familiar with Generator Reporting Procedures?

1. Annual Reports YES NO
2. Exception Reports YES NO
3. Spills and Discharges into the Environment YES NO
4. Comments

Unknown

F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport? YES NO

1. Packaging 40 CFR 173, 178, 179, and with requirements of STATE YES NO
2. Labeling 49 CFR 172 YES NO
3. Marking 40 CFR 172 YES NO
4. Placarding 49 CFR 172 Subpart F YES NO
5. Containers with of hazardous waste must be marked with the following or essentially equivalent, words and in information, displayed in accordance with 40 CFR 172.304.

No wastes shipped off site

HAZARDOUS WASTE - State and Federal Law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's Name and Address
Manifest Document No. _____

6. Comments"

G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed, or recovered?

YES (NO)

1. If yes, what are they _____

a. Sludge ( )
b. Characteristic HW ( )
c. Listed HW ( )
d. Comments

IV. Transporter Regulations (40 CFR 263) (Date Revised March 8, 1984)

Unknown. Facility not operational. No records available

A. Transporter facility description.

1. Operates as a Transfer Facility YES NO

2. Operates as a Storage Facility YES NO

3. Operates as a Generator YES NO

4. Imports Wastes YES NO

5. Combines Manifested Shipments YES NO

B. Does transporter have an EPA ID? YES NO

C. Does the transporter comply with generator regulations under Part 262 if he imports hazardous waste or combines wastes of different DOT shipping descriptions into a single container? YES NO

D. Does the transporter comply with storage regulations under Parts 270, 264, and 265 if he stores manifested shipments at a transfer facility for more than 10 days? YES NO

E. Is transporter aware of and complying with manifest requirements under RCRA 263.20?

1. Before transporting HW is manifest dated and signed by generator? YES NO

2. Does the transporter sign, date, and return a copy of the manifest to the generator before transporting waste off the generator's property? YES NO

3. Does the transporter delivering hazardous waste to another transporter or the designated facility:

a. Obtain a signed and dated (S/D) copy of the manifest? YES NO

b. Retain one copy of the manifest containing signatures of the generator, himself, next designated transporter or the designated TSD facility for 3 years from original manifest date? YES NO

c. Give remaining copies of the manifest to accepting transporter or designated facility? YES NO

4. Does transporter deliver the entire quantity of HW accepted to:

   a. The designated facility listed on the manifest? or YES NO

   b. The alternate designated facility in the event the shipment cannot be delivered to the designated facility? or YES NO

   c. The next designated transporter? YES NO

5. If delivery is not possible, does the transporter contact the generator and revise the manifest according to instructions? YES NO

F. In the event of a spill or discharge during transport, does the transporter comply with the requirements set forth in 40 CFR 263.30? YES NO

1. Give notice to generator YES NO

2. Give notice to the National Response Center (800-424-8802) if required by 40 CFR 171.15?

3. Report in writing, as required by 40 CFR 171.16, to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. YES NO

4. Comments YES NO

V. TREATMENT, STORAGE and DISPOSAL (TSD) Interim Status Regulations Facilities, 40 CFR 265. (Date Revised March 8, 1984)

A. Type of Activity

1. Storage

a. Containers	(✓)
b. Tanks	
(1) Above ground	(✓)
(2) Below ground	(✓)
c. Surface Impoundments	( )
d. Waste Piles	( )
e. Other	( )

2. Treatment

a. Settling	( )
b. Evaporation	( )
c. Filtration	( )
d. Energy Recovery	( )
e. Incineration	( )
f. Thermal Treatment	( )
g. Recycling/Recovery	(✓)
h. Chem/Phys/Biological	( )
i. Other	( )

3. Disposal

a. Landfill	(✓)
b. Land Treatment	( )
c. Surface Impoundment	( )
d. Incineration	( )
e. Other	( )

4. Comments:

5. Are hazardous wastes accepted from "outside" (off-site) sources(wastes not generated on site)? (YES) NO — when facility was operating

a. If YES, has a chemical and physical analysis of a representative sample been obtained in accordance with 40 CFR 265.13? YES NO — None available

b. Does the facility confirm that each hazardous waste received at the facility matches the identity of the waste on the manifest? YES NO — Unknown

c. How does the facility determine this? — past records not available

B. Subpart B - General Facility Standards (40 CFR 265.10 - 265.17)

1. Does the facility obtain a detailed analysis of his waste prior to storing, treating, or disposing of it? YES NO

Unknown records not available

Describe:

2. Does the facility follow a Written Waste Analysis Plan Does the Plan include?

a. Parameters to be tested? YES NO
b. Methods of analysis? YES NO
c. Methods to get representative samples? YES NO
d. Testing frequency? YES NO

Comments:

3. Did inspector collect a copy of the Plan for a thorough review of it at EPA's offices? YES NO

4. Security

a. Have site owner/operators taken appropriate measures to ensure against unauthorized entry? YES (NO)

(1) Are signs posted at each entrance to active portion, and at other locations, in sufficient numbers to be seen by any approach? YES (NO)

(2) Are they legible from a distance of 25 feet or more? YES (NO)

(3) Does the facility have a 24-hour surveillance system or artificial or natural barrier/or combination of both, to control access to the active portion? YES (NO)

Comments:

5. Does the facility follow a Written Inspection Schedule (40 CFR 265.15? YES NO

None available

a. Does it include inspecting all:
Monitoring equipment? YES NO
Safety and emergency equipment? YES NO
Security devices? YES NO
Detecting equipment? YES NO

Dangerous waste storage areas? YES NO

b. Is this inspection schedule maintained at the facility? YES NO

c. Is an inspection log maintained? YES NO

(1) Is the log, or its summary, kept at the facility for at least three years from the date of inspection? YES NO

(2) Does the log include:

(a) date of time of inspection? YES NO

(b) inspectors name? YES NO

(c) observations? YES NO

(d) date and nature of repairs? YES NO

Comments:

6. Personnel Training (40 CFR 265.16)

a. Has a training program been developed? What Type? (Classroom/on-the-job) YES NO

b. Does the program include contingency plan and response training? YES NO

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures, and systems including: YES NO

(1) Procedures for using and maintaining equipment? YES NO

(2) Key parameters for automatic waste feed cut-off systems. YES NO

(3) Communications or alarm equipment YES NO

(4) Response to fire and explosions YES NO

(5) Response to ground water contamination incidents? YES NO

(6) Facility shut down? YES NO

Want available

d. Are records available at the facility for the following:

(1) Job title for each position related to hazardous waste management and maintaining equipment? YES NO

(2) Written job description for each job title? YES NO

(a) Does the job description include the skill, education or qualifications required for the position YES NO

(b) The duties assigned to that position? YES NO

(3) A written description of the type and amount of training to be given to those in each job position? YES NO

(4) A record of training completed or experience obtained for each job position by employee YES NO

(5) Was the required training obtained within 6 months of employment or by May 19, 1981, by each individual involved in hazardous waste management activities? YES NO

C. Subpart C - Procedures and Preventions (40 CFR 265.30)

1. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? YES (NO)

   Explain:

2. Is internal emergency communication equipment or alarm systems installed? YES (NO)

   What type?

3. Is a device (e.g., telephone) immediately available for summoning emergency assistance? YES (NO)

4. Are fire extinguishers or other emergency equipment immediately available on-site? YES (NO)

5. Is emergency communications and response equipment tested? YES (NO)

   How often?

6. Is aisle space adequate for emergency response? YES NO

   What is the aisle spacing?

7. Have any arrangements been made with local emergency response organizations? YES (NO)

8. Which organizations?

9. If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? YES NO

   Explain:

D. Subpart D - Contingency Plan and Emergency Procedures 40 CFR 265.50

Not available

1. Has contingency plan been developed? (It may be a modified SPCC plan) YES NO

2. Have incidents occurred where the plan has been implemented? YES NO

3. Have incidents occurred where the plan should have been implemented but was not YES NO

   Explain

4. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

   a. Does the plan describe actions to be taken by personnel in response to fire, explosion, or releases to the environment? YES NO

   b. Does the plan describe arrangements made with external emergency response organizations? YES NO

   c. Does the plan list those qualified to act as emergency coordinator including their name, address, and phone? YES NO

      (1) Is the list current? YES NO

   d. Is all emergency equipment available at the facility listed in the plan? YES NO

      (1) Is the location and a description of the equipment included? YES NO

      (2) Are capabilities described for each piece or equipment unit? YES NO

   e. Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternative routes)? YES NO

f. Is a copy of the plan maintained at the active facility (versus main office)? YES NO

(1) Has a copy been supplied to appropriate off-site emergency response organizations? YES NO
To which?

5. Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
How are they available

6. What are the limits of this person's authority to respond to emergencies?

a. Has an emergency occurred? YES NO

b. Was the plan implemented? YES NO

c. (Describe the incident)

E. Subpart E - Manifest System, Recordkeeping, and Reporting 40 CFR 265.70

No records available at facility

1. Manifest System

a. Upon receipt of a manifested hazardous waste shipment, does the TSD facility:

(1) Sign and date each copy of manifest receipt of certifying waste? YES NO

(2) Note any discrepancies on each copy? YES NO

(3) Give delivering transporter one signed and dated copy of the manifest? YES NO

(4) Send a S/D copy of the manifest to the generator within 30 days after delivery and? YES NO

(5) Retain a copy of each manifest at the facility for 3 years from delivery? YES NO

b. If the TSD facility initiates a hazardous waste shipment, does it comply with generator requirements in Part 262? YES NO

c. Does the TSD facility examine manifests and wastes received to detect any significant discrepancies in quantity or type of waste, such as: YES NO

(1) Bulk waste-quantity variation of 10 percent or greater

(2) Batch waste - any variation in piece count

(3) Waste type - obvious differences discernible by inspection or waste analysis

d. If significant discrepancies are found, does the TSD facility:

(1) Reconcile discrepancies with generator or transporter within 15 days? or YES NO

(2) Immediately submit to EPA-RA a Discrepancy Report describing the discrepancy and attempts to resolve it and a copy of the manifest involved? YES NO

e. TSD facilities musy keep a written operating record documenting the following details:

(1) Waste description and quantity received

(2) Methods and dates of its treatment, storage, and disposal

(3) The location and quantity of each HW at the facility

2. Operating Record

a. Does the owner/operator of the facility maintain an operating record at the facility (40 CFR 265.73)? YES (NO)

No records available

b. Does the record contain the following information.

(1) A description of, and the quantity of each HW received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility? YES NO

(2) The location of each Hazardous Waste within the facility, and its quantity? YES NO

(3) A map showing disposal sites? YES NO

(4) Summary reports and details of all incidents that require implementing the Contingency Plan? Yes NO

(5) Records and results of inspections as required (need only be kept three years)? YES NO

(6) All closure and post-closure cost estimates required for the facility? YES NO

(7) The results of testing and waste analysis? YES NO

3. Facility Reporting Procedures

a. Has the owner/operator prepared and submitted a single copy of the Annual Report to EPA by March 1 of each year? YES (NO)

b. Is owner/operator familiar with procedures for emergencies? YES NO Unknown

c. If a TSD facility accepts a regulated hazardous waste shipment without the required manifest or shipping paper, does it file an "Unmanifested Waste Report" within 15 days or receipt? YES NO Unknown

F. Subpart F - Ground-Water Monitoring (40 CFR 265.90)

1. Are ground-water (GW) monitoring regulations required at this facility? YES NO

Possibly — Wastes have been spilled or disposed of in the ground

2. If YES, what is the relevant process unit?

a.	Surface impoundment	( )
b.	Waste pile	( )
b.	Land treatment	( )
c.	Landfills	( )
d.	Other	( )

Describe:

3. Has the owner/operator implemented a ground water monitoring plan? YES (NO)

4. If NO, has the facility implemented one of the following:

a.	GW Waiver [265.90(c)]	( )
b.	Alternate GW Monitoring System [265.90(d)]	( ) No
c.	Neutralization Waiver (265.90(e)]	( )
d.	Describe:	

5. Does the ground water monitoring program consist of the following:

a.	At least 1 upgradient and 3 downgradient wells?	YES	NO
b.	GW Sampling and Analysis Plan	YES	NO
c.	GW sampling quarterly first year	YES	NO
d.	GW sampling semiannually after that	YES	NO
e.	Drinking Water Standards parameters	YES	NO
	Sampling frequency_____		
f.	GW Quality parameters	YES	NO
	Sampling frequency_____		
g.	GW Indicator parameters	YES	NO
	Sampling frequency_____		
h.	GW elevation parameters	YES	NO
i.	Outline GW Quality Assessment Program	YES	NO
j.	Statistical Analysis of Indicator parameters	YES	NO

Results:

No ground water monitoring system in existence at facility.

6. Has the facility implemented GW Quality Assessment program? YES NO

   a. Date: _____
   b. Results: _____

7. Does the facility maintain the necessary records.

   a. Initial background parameter concentrations YES NO
   b. Subsequent parameters concentrations YES NO
   c. Statistical evaluations YES NO

8. Has the facility reported necessary information YES NO

   a. DW Standards for 1st year YES NO
   b. GW Indicator parameters annually YES NO
   c. Statistical evaluation YES NO

9. Comments:

G. Subpart G - Closure and Post-Closure (40 CFR 265.110)

Closure

1. Has the facility developed a closure plan which outlines all necessary steps to safely close the facility? (40 CFR 265.117)

   No - none available at facility

   a. Description of how and when the facility will be partially closed (if applicable) and finally closed? YES NO

   b. Estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility? YES NO

   c. Description of the steps needed to decontaminate the facility equipment during closure? YES NO

   d. Comment:

Post-Closure

2. Has the facility developed a post-closure plan which contains the following steps to safely care for the facility after closure/post-close of the facility? (40 CFR 265.117)

   No - none available at facility

   a. Description of how post closure will be carried out for the next 30 years. ( ) ( )

   b. Notice to the local land authority within 90 days after closure is completed? ( ) ( )

   c. Notice in deed to property? ( ) ( )

H. Subpart H - Financial Requirements 40 CFR 265.140

1. Liability

a. (1) Does facility maintain liability insurance for sudden occurrences in the amount of at least $1 million per occurrence with an annual aggregate of at least $2 million? YES NO

No records available

(2) By what method did the owner/operator demonstrate sudden liability coverages to the RA?

(a) HW facility liability endorsement(s) ( )

(b) HW facility certificate(s) of liability insurance ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mechanisms (specify) ( )

b. (1) If a surface impoundment, landfill, or land treatment exist at the facility, does facility maintain liability insurance for nonsudden occurrence in the amount of at least $3 million per occurrence with an annual aggregate of at least $6 million? YES NO

(2) By what method did the owner/operator demonstrate non-sudden liability coverage to RA?

(a) HW facility liability endorsement(s)' ( )

(b) HW facility certificate(s) of liability insurance' ( )

(c) financial test ( )

(d) corporate guarantee ( )

(e) multiple mehcanisms (specify) ( )

No records available

c. Has owner/operator submitted an originally signed duplicate of liability coverage demonstration to RA?

d. Is wording of liability coverage instruments identical to that specified in 40 CFR 264.151?

YES NO

Comment:

2. Assurance

a. Closure

(1) Has facility prepared a written estimate of the cost of closing the facility in accordance with the closure plan (40 CFR 265.112)? Yes NO

(2) Has this cost estimate been adjusted annually for inflation? YES NO

(3) Has facility established financial assurance for the closure of the facility (40CFR 265.143)?

YES NO

(4) By what method has this been achieved:

a.	Trust dund	( )
b.	Surety bond (with standby trust)	( )
c.	Letter of credit (wiyh standby trust)	( )
d.	Insurance	( )
e.	Financial test	( )
f.	Corporate quarantee	( )
g.	Multiple mechanisms	( )

(5) Has facility submitted an originally signed duplicate of financial assurance to RA? YES NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151.

YES NO

(7) Comment:

b. Post-Closure (Disposal Facilities)

(1) Has facility prepared a written estimate of the cost of post-closure monitoring and maintenance of the facility (40 CFR 265.144)? YES NO

(2) Has this cost estimate been adjusted annually for inflation? YES NO

No records available

(3) Has owner/operator established financial assurance for the post-closure care of the facility (40 CFR 265.145)?

YES NO

(4) By what method has this been achieved:

(a)	Trust fund	( )
(b)	Surety bond (with standby trust)	( )
(c)	Letter of credit (with standby trust	( )
(d)	Insurance	( )
(e)	Financial test	( )
(f)	Corporate guarantee	( )
(g)	Multiple Mechanisms	( )

(5) Has owner/operator submitted an originally signed duplicate of financial assurance to Regional Administrator?

YES NO

(6) Is wording of the financial assurance statement identical to that specified in 40 CFR 264.151?

YES NO

I. Subpart I Use and Management of Containers (40 CFR 265.170)

1. Does this section apply to this facility? (YES) NO

2. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? YES (NO)

3. Are the containers always closed, except to add or remove waste? YES (NO)

4. Are container storage areas inspected weekly for leaks and container deterioration (40 CFR 265.174)? YES (NO)

5. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES (NO)

6. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? (YES) NO

7. Is the facility aware of and complying with the following requirements for incompatible wastes:

   a. Incompatible wastes must not be placed in the same containers, unless in compliance with 265.17(b) YES NO

   b. HW must not be placed in an unwashed container that previously held an incompatible waste YES NO

   c. Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall, or other device? YES NO

   Explain?

8. Are containers marked or labeled in a manner equivalent to 40 CFR 172 subpart E? YES (NO)

9. Comments:

J. Subpart J - Tanks (40CFR 265.190)

1. Does this section apply to this facility? (YES) NO

2. Do tanks on the facility hold hazardous waste? (YES) NO

If so, what are their contents?

D-001, D-002
F-002, F-005

Facility abandoned No management of tanks

3. Is storage in tanks conducted such that:

a. It does not generate heat, pressure, fire, explosion or violent reaction? (If no, explain) YES NO

b. It does not produce uncontrolled toxic mists, fumes, dusts, or gases? (If no, explain) YES NO

c. It does not produce uncontrolled flammable fumes or gases? YES NO

d. It does not damage the tank? YES NO

e. It does not threaten the environment in other ways (i.e., leaks, spills)? YES NO

Comments:

4. Is 2 feet of freeboard maintained in uncovered tanks? YES NO

If no, is secondary containment used? YES NO

(Explain)

5. Is the tank(s) continuously fed? YES NO

If yes, is there a means to stop inflow? YES NO

Explain

6. Are Hazardous Waste storage tanks operated in a manner which minimizes the possibility of overfilling? YES NO

How:

Waste feed cut-off ( )
Bypass system to another tank ( )
High level alarm ( )
Other _____

7. Are inspections of the following conducted:

   a. Discharge control equipment? YES NO
      How often?

   b. Waste feed cut-off systems? YES NO
      How often?

   c. Data from tank monitoring equipment? YES NO
      How often

   d. The level of waste in the tank? YES NO
      How often?

   e. The structural integrity of tank? YES NO
      How often?
      How are inspections conducted?
      What is observed (looked for)?

   f. The immediate area around the tank for signs of leaks and the integrity of secondary containment (if any)? YES NO

8. Have any tanks once used for storage of hazardous waste been closed or their function changed? When?

   a. Were all hazardous wastes and/or residues removed? YES NO

   b. What was the disposition of the wastes or residues (i.e., where did it go)? YES NO

   c. When shipped?

9. Are ignitable or reactive wastes placed in tanks? YES NO

10. If yes, what measures are used to prevent ingnition or reaction?

11. Have wastes been placed in a tank which previously contained potentially incompatible waste or residue? YES NO

12. If reactive or ignitable wastes are stored in covered tanks, are they in compliance with the National Fire Protection Association's buffer zone requirements? YES NO

13. Are "No Smoking" signs posted? YES NO

Facility is bonded. No management of Tanks

Facility abandoned No management at landfill

14. Have others measures been adopted to reduce hazards associated with storage of ignitable or reactive waste in tanks? YES NO

Explain

15. Waste Analysis and Trial Tests

Before treating and storing of hazardous waste in a tank is a detailed chemical and physical analysis of the waste obtained? YES NO

16. Does the company have and follow a written waste analysis plan? YES NO

a. Does the plan identify parameters used? YES NO

Explain

b. Sampling Method? YES NO

Explain

c. How frequent is analysis repeated? YES NO

d. Are results of waste analysis and trial tests placed in the facility's operating record.

17. Are waste analyses done when a tank is used to treat or store a HW which is substantially different or treated differently from waste previously treated or stored in the tank? YES NO

K. Subpart K - Surface Impoundments (40 CFR 265.220)

N/A

1. Does this section apply to this facility? YES NO

2. Does the surface impoundment maintain enough freeboard to prevent any overtopping of the dike by overfilling, wave action, or a storm? YES NO

3. Are the surface impoundments designed and operated to allow two feet of freeboard? YES NO

4. Do earthen dikes have a protective cover which minimizes erosion (grass, rock, shale)? YES NO

5. Is a waste analysis or trail test conducted whenever a surface impoundment is used to chemically treat a HW which is substantially different or treated differently from waste previously treated in the surface impoundment? YES NO

6. Are results of waste analyses documented in the facility's operating record? YES NO

7. Are the surface impoundments inspected on a routine basis? How often? YES NO

8. Are ignitable or reactive wastes held in a surface impoundment (40 CFR 265.229)? YES NO

9. Comments: